Case 3:14-cr-00267-JO Document 228 Filed 03/24/16 Page 1 of 45

1	IN THE UNITED STATES DISTRICT COURT
2	FOR THE DISTRICT OF OREGON
3	UNITED STATES OF AMERICA,)) Case No. 3:14-CR-267-BR
4	Plaintiff,)
5	v.) November 5, 2015
6	FABIAN SANDOVAL-RAMOS(1) and RAUL)
7	ARCILA(3),)
8	Defendants.)) Portland, Oregon
9	
10	TRANSCRIPT OF PROCEEDINGS (Excerpt of the Testimony of Sommer Andersen)
11	BEFORE THE HONORABLE ANNA J. BROWN, DISTRICT JUDGE
12	
13	
14	
15	
16	
17	
18	
19	
20	
21	
22	COURT REPORTER: AMANDA M. LeGORE
23	CSR, RDR, FCRR, CRR, CE U.S. Courthouse
24	1000 SW Third Avenue Rm 301 Portland, OR 97204
25	(503)326-8184

1 APPEARANCES: FOR THE PLAINTIFF: LEAH BOLSTAD 2 (Assistant U.S. Attorney) ELISSA GOLOBORODKO 3 (Certified Law Student) U.S. Attorney's Office 4 1000 SW Third Avenue Portland, OR 97204 5 (503) 727-1000 6 7 FOR DEFENDANT SANDOVAL-RAMOS: BENJAMIN ANDERSEN 8 121 SW Salmon Street 1420 World Trade Center 9 Portland, OR 97204 (503) 222-2510 10 11 FOR DEFENDANT ARCILA: ROBERT SEPP 2350 Willamette Falls Drive, Suite 9 12 West Linn, OR 97068 (503)998-771913 14 15 16 17 18 19 20 21 22 23 24 25

Andersen - D (The following excerpt of testimony was held on 1 Thursday, November 5, 2015; 4:52 p.m.) 2 3 MS. BOLSTAD: The final witness will be Detective Andersen. 4 5 We will finish by 5:00. THE COURT: Well, that's good to know. I had some 6 other things in mind in addition. But, yes, all right. 7 8 Detective, would you come back to the witness chair. 9 She's already sworn. 10 Yes, jurors, you'll recall this witness took the oath 11 previously. She remains under oath. 12 Go ahead and take a seat. THE WITNESS: Thank you. 13 14 DIRECT EXAMINATION 15 BY MS. BOLSTAD: 16 Q. Detective, we've heard about phones seized in this case. 17 Were you able to examine those phones for evidence of 18 drug trafficking? 19 A. Yes, I was able to examine the downloaded contents of those 20 phones. Q. Let's start with Ms. Godvin, Mr. Rosa, and Mr. Baker; their 21 22 phones. 23 Did you examine Ms. Godvin's phone? 24 Yes, I did. Α. 25 Did you observe any evidence suggesting that she had a

1 source for heroin other than Mr. Rosa in March 2014?

- 2 A. No.
- 3 Q. Did you examine Mr. Rosa's phone?
- 4 A. I did.
- 5 Q. Did you observe any evidence suggesting that he had a
- 6 source for heroin other than Mr. Baker in -- in March 2014?
- 7 A. No.
- 8 Q. Did you examine Mr. Baker's phone?
- 9 A. I did.
- 10 Q. Did you observe any evidence suggesting that he had a
- 11 source for heroin, other than Mexican Bobby, in March 2014?
- 12 A. No.
- 13 Q. Let's talk about the traffic stop on April 2nd.
- Did investigators seize a cell phone from Mr. Arcila?
- 15 A. Yes.
- 16 Q. Were you able to examine the contents of that phone?
- 17 A. Yes.
- 18 Q. What was the phone number assigned to Mr. Arcila's phone?
- 19 ■ A. If you don't mind, I've made a summary of those notes. I
- 20 would like to refer to it, as we go, for those numbers.
- 21 Q. Please do so.
- 22 A. Thank you.
- 23 Q. If there's an objection, we'll hear it.
- 24 A. The number in Mr. Arcila's phone as the contact for that
- 25 phone was 971-279-0581.

Q. Were you able to obtain the call logs from Mr. Arcila's phone, meaning the calls received by the phone and the calls

- 3 placed by the phone?
- 4 A. Yes.
- 5 Q. And have you compiled those logs into Exhibit 126?
- 6 A. Yes.
- 7 MS. BOLSTAD: The Government would move to admit 126.
- 8 MR. ANDERSEN: I have no objection.
- 9 MR. SEPP: No objection.
- 10 THE COURT: Thank you. Received.
- 11 Please publish and proceed.
- 12 BY MS. BOLSTAD:
- Q. And on the screen in front of you, is this the first page
- of that exhibit of the call logs from Mr. Arcila's phone?
- 15 A. Yes.
- 16 \blacksquare Q. I see the parties are listed at points on this sheet.
- Are those the contacts as he had them listed in his phone?
- 19 A. Correct. If there was a contact for a number stored in the
- 20 contacts section of the phone, the program that extracted that
- 21 data from the phone, as I would print these or run these
- 22 reports, would combine those into one item.
- So where it shows the "to" or "from," and a phone
- 24 number, the name that appears next to it -- if there is one --
- 25 \parallel comes from that contact list from that same device.

Case 3:14-cr-00267-JO Document 228 Filed 03/24/16 Page 6 of 45 Andersen - D Let's talk about Mr. Ramirez-Coronel, the traffic stop on 1 2 April 2nd. 3 Did agents seize a cell phone from him? 4 Α. Yes. 5 Were you able to examine the contents of that phone? 6 Α. Yes. And did you put the call logs from within that phone into 7 8 Government Exhibit 127? 9 Α. Yes. 10 MS. BOLSTAD: Government moves to admit 127. 11 MR. ANDERSEN: No objection. 12 MR. SEPP: No objection. 13 THE COURT: Thank you. Received. 14 Publish, and proceed, please. 15 BY MS. BOLSTAD: 16 Q. Like Mr. Arcila's phone, were the contacts as saved what is 17 shown in Exhibit 127? 18 A. Yes. 19 So these are not your labels for the contacts, but those

are the labels that were in the phone itself?

How many cell phones were seized from location 2 that

20

21

22

23

24

25

Α.

Α.

Exactly.

Two.

Q. Let's go to location 2.

belonged to Fabian Sandoval-Ramos?

And is one of those the dumpster phone? 1 Q.

- 2 Α. Yes.
- 3 We'll get to that in a moment. Q.
- 4 Is the other the iPhone?
- 5 Α. Yes.
- 6 Is that Government's 109? Q.
- 7 Α. I don't have a reference to know if that is accurate.
- 8 if you say it is, I believe it would be.
- 9 Okay. So let's talk about the iPhone.
- 10 Were you able to examine the contents of that phone?
- 11 Yes. Α.
- 12 And what was the phone number of it?
- The contact number for the iPhone was 503-313-6547. 13
- 14 When you examined the iPhone, in general -- oh, and let me
- 15 just stop here and -- did you put the information that you're
- 16 testifying to into a summary?
- 17 Α. I did.
- 18 And right now, are we laying a foundation for your summary
- 19 to be later shared with the jury?
- 20 Α. Yes.
- 21 Okay. And so these -- these items might become known to
- 22 you later, they might not.
- 23 When you examined the iPhone from Fabian
- 24 Sandoval-Ramos's house, what was the phone number assigned to
- 25 that phone?

- 1 A. The one I just stated, 503-313-6547.
- 2 Q. Did you observe evidence of drug trafficking on that phone?
- 3 A. No.
- 4 Q. Did it appear to be a normal usage phone? By normal usage,
- 5 I mean pictures of family, friends, et cetera?
- 6 A. I don't recall what photos were on the phone.
- 7 Q. Okay. Did Mr. -- did Fabian Sandoval-Ramos's iPhone, did
- 8 it have the number for Raul Arcila in it?
- 9 **A.** It did.
- 10 Q. Saved as the same number you testified to earlier for Raul
- 11 Arcila?
- 12 A. It wasn't saved to the name Raul Arcila, but that phone
- 13 number was saved in the contact list.
- 14 Q. What was it saved as?
- 15 A. Pelon.
- 16 Q. P-E-L-O-N?
- 17 A. That's right.
- 18 Q. In examining the contents of the phone seized from
- 20 have Mr. Raul Arcila's phone number in it?
- 21 A. It did.
- 22 Q. What was it saved as?
- 23 A. Pelon.
- 24 Q. And when you were looking in Placido Ramirez-Coronel's
- 25 phone, did you observe the iPhone phone number of Fabian

1 | Sandoval-Ramos, 503-313-6547?

- 2 A. Yes.
- 3 Q. And what was that contact number saved as in Placido
- 4 Ramirez-Coronel's phone?
- 5 A. That was saved as one word, "Flavian," which was
- $6 \quad \blacksquare \quad F-L-A-V-I-A-N.$
- 7 Q. Was that same iPhone number for Flavian, was that number
- 8 saved in Raul Arcila's phone?
- 9 A. Yes.
- 10 Q. What was it saved as?
- 11 A. As one word, "Fabi," F-A-B-I.
- 12 Q. Do you believe these to be nicknames for Fabian?
- 13 A. That would be my assumption.
- 14 Q. Did you observe any other contacts in Placido
- Ramirez-Coronel's phone for a similar nickname?
- 16 A. Yes.
- 17 Q. What was the nickname?
- 18 A. Let me refer to my notes here for a moment.
- There was a nickname "Faby," F-A-B-Y, as -- in the
- 20 contact list in Placido Ramirez's phone.
- 21 \blacksquare Q. What was the number associated with F-A-B-Y?
- 22 \blacksquare A. That was 206-473-7989.
- 23 Q. Let's talk about the phone found in the dumpster at
- 24 | location 2.
- 25 Were you able to examine the contents of that phone?

10

1 A. Not the call contents or the text message contents, or

- 2 things of that nature.
- 3 Q. Okay. Were you able to determine the phone number assigned
- 4 to that broken phone?
- 5 A. Yes.
- 6 Q. Did part of your determination involve looking at
- 7 Mr. Ramirez-Coronel's phone and that Faby, F-A-B-Y, number?
- 8 A. Part of it, yes.
- 9 Q. Okay. Did you look into the phone number assigned as Faby
- 10 in the Placido Ramirez-Coronel's phone? And what I'm asking is
- 11 did you request records from the cell phone company for
- 12 206-473-7989?
- 13 A. Yes. Those requests -- those records were requested, yes.
- 14 Q. And did you receive those records?
- 15 A. Yes.
- 16 Q. Which phone company provided them?
- 17 A. It was a prepaid phone from Verizon.
- 18 Q. And did you place those records from Verizon in
- 19 Government's Exhibit 124?
- 20 A. I believe so, yes.
- 21 MS. BOLSTAD: Government moves to offer 124.
- MR. ANDERSEN: No objection.
- MR. SEPP: No objection.
- 24 THE COURT: Received.
- 25 Please post it, and proceed.

1 BY MS. BOLSTAD:

Q. Tell the jury what we see in these call records, in terms of the columns.

A. Sure.

The first column on the left is labeled "Network Element Name," and that's a column that refers to a geographic location that covers hundreds of cell phone towers. Lots and lots of cell phone towers. Other phone records that we'll sometimes review will have specific cell phone towers themselves listed for calls, where this one just gives a network element. So it's just a name for — typically a region that covers a very large number of cell phone towers.

The next number over is the mobile directory number, which is just a number for which we've requested records. So you'll see, as -- every single line of this column has that same number.

The next number is a dialed digit number, which is the number dialed by the person making the phone call. And the next number is a call direction, which shows whether it's an incoming or an outgoing call.

The next column is listed "Seizure DTTM," for date and time. And it lists the date -- date and time that the record was created. And the seizure duration is listed in seconds for the length of seconds of that particular call.

And then finally, at the very end, is the calling

12

party number, which lists which phone number was used to place the call.

- Q. When you sent that subpoena request, did you -- did you refer to the ESN number from the seized phone?
- A. I don't know if that was included as part of the request in general, but it was something that was received in response.
- Q. Okay. And so what was the -- what are the last three digits of the ESN on the back of the dumpster phone?
- 9 A. That's E48.

Verizon records?

- 10 Q. And did that ESN number come back as listed on those
- 12 A. It did.

3

4

- Q. And did that give you a clue about whether the -- what the
- phone number might be to the dumpster cell phone?
- 15 A. Yes. That same -- the whole entire number was a match from
- 16 the records provided by Verizon for that 206 phone number and
- 17 the actual device recovered in the dumpster. Looking at the
- back of that device, you can see that number on the back.
- 19 Q. And what does "ESN" stand for?
- 20 A. I'm not entirely sure, but I think it stands for, like, 21 equipment serial number or electronic serial number.
- 22 And it's -- I know that the purpose of that number is 23 it's a unique number that identifies a particular handset.
- MS. BOLSTAD: The government moves -- oh, thank you.
- 25 BY MS. BOLSTAD:

13

1 Q. We've heard evidence about Mr. Baker's calls to a Mexican

- 2 Bobby phone number with area code 442.
- 3 **A.** Yes.
- 4 Q. Did you request records for the provider -- the service
- 5 provider for that phone number?
- 6 A. For the 442 number, yes.
- 7 Q. Okay. And did you receive those -- those toll records and
- 8 use them for Government Exhibit 123?
- 9 A. Yes.
- MS. BOLSTAD: Government moves to offer Exhibit 123.
- 11 MR. ANDERSEN: No objection.
- 12 MR. SEPP: No objection.
- 13 THE COURT: Thank you. Received.
- 14 Please publish, and proceed.
- 15 BY MS. BOLSTAD:
- 16 \blacksquare Q. During the March 2014 time frame, based on these tolls for
- 17 the 442 number, were you able to determine the location, the
- 18 physical location of the 442 phone?
- 19 \blacksquare A. We could get an idea based on that network element name.
- 20 It would give a large region.
- 21 So in this case, on this first page, if you look down
- 22 along that first column, the first many records list Los
- 23 Angeles gateway, followed by Los Angeles 44, which would be
- 24 network nicknames for that large group of towers there.
- 25 And it's just -- it's just a matter of where the call

is routed through. I don't think it necessarily absolutely confirms that the handset is present in that location. In fact, as we go forward through the list, you'll see that at times the network element will jump from one to the next, even within a very brief period of time. So unlike a specific cell phone tower, where you can pinpoint where that tower is located, this is just listing a larger area.

- Q. Okay. And although you cannot pinpoint exact location, do you believe that the lengthy sequences of Los Angeles, Los Angeles, Los Angeles, do you believe that that means the phone was in the area of Los Angeles during those time frames?
- A. I believe that it could have been, yes.
- Q. Was there also a time period in March 2014 where the network element or location identifier listed Hillsboro?
- 15 A. There is. In fact, even on this page, if we go back one,
 16 there's a line where it lists Hillsboro individually in the
 17 midst of other Los Angeles locations. Whereas, going
 18 forward -- like predominantly, all through the date of March
 19 16th, all of the calls are routed through that Hillsboro
 - Q. And in the same time period, Detective Andersen, did you compare the tolls from the phone with the 206 area code, the phone found in the dumpster?
- 24 A. Yes.

network name as a call.

Q. What was the location of that dumpster phone in the same

15

1 relevant periods?

- 2 A. If you would like to bring it back up to the -- the prior
- 3 record that we just reviewed.
- 4 Q. I think that's Government's 124.
- 5 A. And so we begin in Hillsboro. And continuing to move
- forward, we are seeing Hillsboro, Seattle, Hillsboro as a large
- 7 area for the call network.
- And then later in the month, Los Angeles is listed;
- 9 among other locations.
- 10 Q. What about from March 31st to April 2nd?
- 11 A. March 31st through April 2nd, Hillsboro, Seattle shown on
- 12 this page here. The next page, Hillsboro, Seattle, Seattle,
- 13 Hillsboro, and again.
- 14 Q. And can you say with certainty where the phone was at any
- 15 particular date?
- 16 A. No.
- 17 Q. Okay. Are you comfortable with the idea that these
- 18 □ locations are associated with that phone somehow?
- 19 A. Yes.
- 20 Q. Do you also have call records that you found within the
- 21 cell phones seized from Mr. Arcila and Mr. Ramirez-Coronel,
- 22 which were admitted as 126 and 127?
- 23 A. Yes.
- 24 Q. Did you examine those seized cell phone call logs in
- 25 \parallel conjunction with the toll records provided by the service

16

1 providers for the other two phones?

- 2 A. I did.
 - Q. What were you looking for?
- 4 A. I was looking to see if there was a pattern of contact or a
- 5 link of contact as you move from one person involved in this
- 6 case to another, to see who was talking to whom.
- 7 Q. I would like to show you, and you alone, Government Exhibit
- 8 129.

- 9 I'll show it to you in paper form, while I'll let you
- 10 work on that.
- 11 A. Thank you. (Handed document.)
- 12 Q. Did you make this document?
- 13 A. I did.
- 14 Q. How did you make it?
- 15 A. What I made is -- it began with a spreadsheet, where I
- 16 copied and pasted the different downloads from the different
- 17 devices, whether it was from the phone company or whether it
- 18 was extracted from the phone itself. And then put them all in
- 19 \parallel the same order so they were in chronological form. So that
- 20 rather than looking only at one person's calls and then moving
- 21 on and looking at only another person's calls, I was able to
- 22 see all of the calls in one setting, organized by date.
- 23 Q. Did you first focus on a particular time period for this
- 24 document?
- 25 \blacksquare A. For this document, I focused only on April 2nd.

17

1 Q. Why did you focus on that date?

A. That was a date that we had a lot of information that we knew that was directing certain events that were happening, calls that we were directing to be placed. And then also things we knew to be true as far as traffic stops we had conducted — or a traffic stop, I should say, and then search warrants that were later executed. So I had different times to refer to that I knew certain events were occurring, to compare

Q. Okay. And have you checked and rechecked the accuracy of your summary?

to the phone calls that were made and received.

12 A. I have.

2

3

4

5

6

7

8

9

10

11

15

16

23

24

25

- Q. And did you check it against those items received from the phone companies and from the seized phones?
 - A. I did. And I believe them to be accurate, to the best of my ability.
- MS. BOLSTAD: The Government moves to admit summary

 Exhibit 129.
- 19 (Pause, counsel conferring.)
- 20 MR. ANDERSEN: I have no objection to that your 21 Honor.
- 22 THE COURT: Thank you.

MR. SEPP: No objection except for that the jury be known that they can compare it to the actual logs themselves to show that it is indeed accurate.

18

THE COURT: So, Jurors, a summary exhibit is offered as a convenience to you, to help collect data points about evidence, but the summary isn't evidence. It is just the witness's effort to collect certain parts of it. So it's only as good as the reliability of the data collected. And it's -for you to rely on the summary, you have to be able to know for yourself whether it's accurate, and that would be left for you to determine.

So as a summary, the witness is -- I'm sorry, the exhibit is received.

Go ahead.

BY MS. BOLSTAD:

1

2

3

4

5

6

7

8

9

10

11

12

13

15

16

17

18

19

20

21

22

23

24

25

- Q. And so please explain to the jury what this document 14 contains.
 - A. At the very top, I included a legend, which would just show which phone number belongs to which person involved in this case.

Starting with the top, with the phone number that was saved in Shane Baker's two phones as Mexican Bobby, the 442 number, followed by the phone that was found in the dumpster at location No. 2, followed by the phone that was seized from Raul Arcila with the corresponding phone number, the phone that was seized from Placido Ramirez-Coronel, the phone -- the iPhone that was found within location 2, and then tolls received for another number as well.

19

And then below that list, in order of date and time, from older to newer, with the hours listed in sort of a 24-hour format where, you know, 1:00 p.m. would be 1300 hours, listing the calls; date and time the call was captured up by the tolls or by the download; the length of the call; the person — or the phone number that initiated the call; the phone number that received the call or the destination number; the contact name, if any, that was from a device. And then a description on the far right there of the summary that I had created of what the — each individual line was.

- MS. BOLSTAD: Could we go to the bottom of this 129.
- MS. COOKE: This page?
- MS. BOLSTAD: This page.
- 14 I'm sorry, the bottom of the next page.
- 15 BY MS. BOLSTAD:

1

2

3

4

5

6

7

8

9

10

- Q. I see in the middle of this a black mark for traffic stop on Honda.
- 18 Did you enter that information?
- 19 A. I did.
- Q. And what did you base that on from where you entered it in the chart?
- A. I based it on our knowledge of when we had made those

 calls, as far as when we saw movement of that vehicle, and then

 about how long after that I recall the traffic stop occurring,

 as well as the fact that after about that seven -- or, sorry,

20

5:25 to 5:30 p.m. range, any phone calls that were placed to
Placido Ramirez-Coronel's phone or Raul Arcila's phone were not
able to be answered, did not appear to be answered; because at

Q. Okay. We are having a little bit of a technical problem, so I want to switch gears and move to your examination of other phones in this case. Okay? And we'll come back to this topic once we're set.

Did you look at Mr. Baker's phone content, about his contacts with Mr. Rosa in the week leading up to Justin Delong's death on March 29?

12 A. I did.

4

5

6

7

8

9

10

11

21

22

23

24

25

- 13 Q. Did you see messages between Mr. Baker and Mr. Rosa?
- 14 A. Yes.
- 15 Q. Starting on March 22, what did you observe?

that point they were both detained.

- 16 A. I would like to refer to my police report during this,
- to -- to summarize the messages I had reviewed in those documents.
- Beginning on March 22nd -- give me just one moment to

 find the right spot here. (Pause, referring.)

Okay. So I saw messages from -- back and forth between Michael Rosa's phone, which was saved in Baker's phone as Mikey 2, which is a phone number of 971-804-1412, with Shane Baker's phones on March 22nd, 2014; March 24th, 2014; and March 29th, 2014.

21

Q. Why those particular dates?

1

12

13

14

15

16

17

18

19

20

21

22

23

24

25

- A. I focused on dates that were within the last week, leading up to the overdose death of Justin Delong.
- 4 Q. Okay. And what did you learn?

that would be an order being short.

A. So I learned that on March 22nd, Michael Rosa's phone sent

Shane Baker's phone a message at 11:13 p.m., stating that his

order was short. And I am familiar with this in prior

investigations. That, you know, again, drugs are sold by

weight. And so if a person orders a certain amount, it's an

order placed by a weight requirement or a weight request. And

if what's provided doesn't weigh out to be what they expect,

Another conversation from the 23rd, from 10:45 p.m., they discuss a meeting near Powell and 82nd Avenue in Portland, where Baker, his phone sends a message to Rosa's phone, stating that he had to leave the area due to cops being everywhere.

And Rosa responds with a message, No worries. Not like I'm out, or anything.

And I interpret that to mean that it wasn't a problem for Rosa because he wasn't out of heroin, and it wasn't a problem to wait.

The following day, at 10:29 p.m., Shane Baker's phone sent Michael Rosa's phone a message, saying:

I'm on my way to town now. Got yours on me for
five or six. How many?

```
22
                               Andersen - D
               Rosa responds: Five.
 1
               And Baker replies: Okay. 5.20 is what I have for
 2
 3
               you.
               And the message exchange continues back and forth
 4
 5
     with a discussion to meet at McDonald's on Foster, at 82nd.
        Were there other messages between Mr. Rosa's phone and
 6
 7
    Mr. Baker on March 28th?
 8
     Α.
        Yes.
 9
        Tell us about that, in brief.
10
        On March 28th at 3:58 p.m., Baker's phone sent a message to
11
    Rosa's phone that read:
12
               What's up with you? I need to grab that money.
13
               Rosa replied, about nine hours later, at 1:14 a.m.,
14
     on March 29th, 2014, saying:
15
               Sorry, didn't see your message until right now.
16
               I'm going to need to grab more tomorrow, anyway,
17
               so I'll have it all for you.
18
               Baker's phone replied: Okay. Just call me in the
19
               morning then.
20
               And the following afternoon, March 29th, 2014, at
21
     1:07 p.m. -- I have a typo in my report, where it says:
22
               Rosa texts Baker his address. Baker --
23
               THE COURT REPORTER: I need you to speak slower,
24
     please.
```

THE COURT: I have a typo in my report?

23

1 THE WITNESS: Yes. It should read:

2 Baker texts Rosa his address as 4200 Southwest

Canyon Road, 107 Ave., Beaverton, Oregon.

4 BY MS. BOLSTAD:

- 5 0. Detective Andersen, we've heard evidence in this case that
- 6 Mr. Rosa went to Ohio and returned in -- in March and around
- 7 this time period.
- 8 While he was gone, do you know who was using
- 9 Mr. Rosa's phone?
- 10 A. I believe that Mr. Goshorn was using Mr. Rosa's phone.
- 11 Q. Okay. And was that with Mr. Rosa's permission?
- 12 A. Yes.
- 13 Q. And was Mr. Goshorn operating at Mr. Rosa's direction?
- 14 A. Yes.
- 15 Q. Still in furtherance of the conspiracy?
- 16 A. Yes.
- 17 Q. Okay. Let's talk about Mr. Baker's phone content about any
- 18 ☐ contacts with the Mexican Bobby phone number in the week prior
- 19 to Justin Delong's death.
- 20 Did you see such connection between Baker and Mexican
- 21 Bobby?
- 22 A. I did.
- 23 Q. Tell us about that.
- 24 A. So beginning, again, with a review starting a week prior,
- 25 ■ on March 22nd, 2014, we see Baker's phone calling the Mexican

24

Bobby number at 8:24 p.m. and 10:25 p.m. that same day, March 2 22nd.

3 And let me find --

(Pause, referring.)

- 5 BY MS. BOLSTAD:
- 6 Q. Do you know the total number of calls placed or received
- 7 between Mr. Baker and the 442 Mexican Bobby number?
- 8 A. I believe it was 30 calls during that time frame.
- 9 Q. The one-week time frame?
- 10 A. Yes.

- 11 Q. How many of those 30 calls were at your direction?
- 12 A. 11 calls.
- 13 Q. And are those 11 calls then something that you or Detective
- 14 McNair observed happening?
- 15 A. Yes.
- 16 \blacksquare Q. Was there any pattern of activity between Mr. Rosa's calls
- 17 with Mr. Baker compared to Mr. Baker's calls to Mexican Bobby
- 18 in that week time frame?
- 19 A. Yes.
- 20 Q. What was the pattern you observed?
- 21 A. (Pause, referring.) Just one moment. (Pause, referring.)
- 22 So I see that Baker's phone has contacts with Mexican
- Bobby in proximity to when there are meets with Michael Rosa or
- 24 conversations with Michael Rosa.
- 25 Prior to the text that Rosa had sent about being

25

shorted on March 22nd, Shane Baker's phone had called the
Mexican Bobby number six times on that date.

On March 29th, at 10:29 p.m., Baker had agreed to sell 5 ounces to Rosa in Portland, as we discussed a bit ago. Foster and 8 -- 82nd Avenue. And Baker had contacted the Mexican Bobby number twice on March 24th, at 10:25 p.m. and again at 11:32 p.m.

- Q. Did you have information, when you were reviewing these phone tolls, about March 29th and Mr. Rosa's meeting with Mr. Baker on the afternoon of the 29th?
- 11 A. I did. I had reviewed all of this after all of my
- 12 interviews were concluded.
- Q. And on that afternoon, when Mr. Rosa reports that he was with Mr. Baker when Mr. Baker contacted his source, did you
- 15 look for that time frame on March 29th, in the records for
- 16 Mexican Bobby?
- 17 A. I did.

3

4

5

6

7

8

9

- 18 Q. What did you observe?
- 19 A. I saw that the phone records for that Mexican Bobby number,
- 20 the 442 number, showed a call from one of Baker's phones to
- 21 that Mexican Bobby number at 4:03 p.m. And then additional
- 22 calls that evening at 8:48 p.m. and 8:54 p.m.
- Q. Is that consistent with what Mr. Rosa reported about when
- 24 he met with Mr. Baker?
- 25 \blacksquare A. Yes. Mr. Rosa told me he met with Mr. Baker around 4:00

26

p.m. that day on the 29th. And that Mr. Baker had called his source, and that Mr. Baker was supposed to be resupplied later that evening; which is why he could only sell Baker 4 ounces

- Q. Let's talk about the 442 number then.
- I'm curious about -- you're seeing these patterns.

 Is that correct? With Baker calling Mexican Bobby?

that afternoon instead of the 5 that Rosa had requested.

8 A. Yes.

4

- 9 Q. Did you look, then, at what would happen with Mexican Bobby
 10 after Mr. Baker called that number?
- 11 A. Yes, to see who would Mexican Bobby call.
- 12 Q. And who did Mexican Bobby call?
- 13 A. Mexican Bobby didn't call.
- Q. Did he not call anyone on that phone that -- any of the records that you've put into evidence in this case?
- A. Right. There were no calls placed out that would explain contacts with numbers like Placido Ramirez-Coronel or others involved in this case.
- Q. Well, we're talking about patterns. Did you look at what would happen when Mr. Baker called that 442 number? Did you
- 21 look for some other phone that might have made outgoing calls
- 22 after that?
- 23 A. Yes.
- Q. What number were you able to identify a phone number that made outgoing calls?

Case 3:14-cr-00267-JO Document 228 Filed 03/24/16 Page 27 of 45 27 Andersen - D 1 Α. Yes. 2 What was that number? 3 That was 760-296-9882. Α. And I want to show you a demonstrative. 4 Q. 5 I hope it doesn't break the whole system. 6 THE COURT: We're good. 7 BY MS. BOLSTAD: 8 What does -- I'm showing you what is Government 9 demonstrative 130. 10 What -- what do you see? 11 A. I see images of Shane Baker, Placido Ramirez-Coronel, 12 Fabian Sandoval-Ramos, and Raul Arcila at the top of the page. Superimposed over a map are Shane Baker and Placido 13 14 Ramirez-Coronel hovering over Oregon. And a phone number down 15 near the bottom of the page, the Mexican Bobby 442 number, with 16 a line drawn from Shane Baker, up in Oregon, down to that 17 number, the 442, which is on top of the state of California. 18 MS. BOLSTAD: The Government asks permission for 19 publication. 20 THE COURT: As a demonstrative? 21 MS. BOLSTAD: Yes, 130.

THE COURT: Any objection?

MR. ANDERSEN: So we're not offering this into

24 evidence?

22

25 THE COURT: It is only a visual aid, and it will only

28

be used in closing arguments, not to go to the jury. It is a demonstrative exhibit, not a summary.

MR. ANDERSEN: I have no objection.

THE COURT: Go ahead.

MR. SEPP: No objection.

THE COURT: As a demonstrative. So this is just a picture of the testimony, so to speak. It will be used when the case is argued to you tomorrow.

You won't have it in the jury room with you, though. So if you think it's of use, you may make notes about it.

Ms. Bolstad.

MS. BOLSTAD: Thank you, your Honor.

BY MS. BOLSTAD:

- Q. And so is this the pattern that you've testified to that
- 15 you were looking at as when Shane Baker would call Mexican
- 16 Bobby?

3

4

5

6

7

8

9

10

11

- 17 A. Yes.
- Q. And then you testified that that 442 number did not make
- 19 outgoing calls after said calls took place?
- 20 A. Correct.
- 21 Q. And what was the other number you identified that did make
- 22 | outgoing calls?
- 23 A. 760 -- sorry -- 296-9882.
- 24 Q. Okay. How did you make the determination that there was
- 25 this other phone, 760-296-9882?

29

A. In reviewing all of the records together as a group, we're looking at one and then referring to another to see. As Shane Baker is calling that Mexican Bobby number, what — what phone numbers are calling Placido Ramirez—Coronel and Fabian Sandoval—Ramos and Raul Arcila. And I found that there was a number that very commonly was calling Placido Ramirez—Coronel after Shane Baker would call this Mexican Bobby number. And the number that called Placido Ramirez—Coronel after Shane

Q. Were you able to determine where the 760 number was physically located during this pattern that you're talking about?

Baker would place those calls was that 760-296-9882 number.

- 13 A. No. The records I received were from Verizon, and they

 14 were the same as what we just looked at for the other 206

 15 number, where it just lists a larger market name.
- 16 Q. Do you have a general geographic area?
- A. In a similar way, at times, it appears to be in Oregon or Washington, and at times it appears to be in California.
- Q. Okay. Did you observe any phone calls between the Mexican
 Bobby phone number and either of the numbers that you have
- 21 linked to Fabian Sandoval-Ramos?
- 22 A. Yes.

1

2

3

4

5

6

7

8

9

10

11

- 23 Q. Tell us about that.
- A. There was one call that was in the phone records provided by Verizon for the 442 number from March 2nd to the number that

30

1 was associated to Fabian Sandoval-Ramos's iPhone.

- 2 Q. Given that the 442 phone number appears to be in the
- 4 and is that the case? It was in California during the week
- 5 before Mr. Delong's death?
- 6 A. Correct. There's a brief period of time around the very
- 7 | middle part of March where it appears to potentially be either
- 8 in Los Angeles or in the Oregon, Hillsboro market.
- 9 Q. What does that fact mean to you?
- 10 A. That when Shane Baker would call the number he had to
- 11 obtain heroin, the person he was calling was likely not the
- 12 person who was delivering the heroin to him. That he was
- 13 calling a dispatcher phone, as we've heard about.
- 14 \blacksquare Q. Did you look for the 760 phone number in Placido's phone?
- 15 A. I did.
- 16 Q. What was it saved as in Placido Ramirez-Coronel's phone?
- 17 A. That was saved as one word -- one word of "Che," C-H-E.
- 18 \blacksquare Q. And that -- did you look for the 760 phone number in Fabian
- 19 Sandoval-Ramos's iPhone?
- 20 A. I did.
- 21 Q. Did you find this number in his iPhone?
- 22 A. I did.
- 23 \mathbb{Q} . Was it saved as a contact?
- 24 A. Yes.
- 25 \blacksquare Q. What was the name of the contact?

31

1 A. It was one letter: "G."

- 2 Q. I want to turn your focus to a very specific time frame:
- 3 April 2nd, 2014, the hours before the buy that Shane Baker set
- 4 up that day.
- 5 Did you examine that time period closely?
- 6 A. I did.
- 7 Q. And did you examine it in a context of your phone tolls and
- 8 the seized call logs from the phones?
- 9 A. I did.
- 10 Q. Did you follow the same process you've already described in
- 11 making that summary Exhibit 129?
- 12 A. Yes.
- 13 Q. And did you make an additional Exhibit -- a summary Exhibit
- 14 | 131?
- 15 You might know the number. It's on --
- 16 A. I did not make that.
- 17 Q. Did you assist in the production of that document?
- 18 A. I did.
- 19 Q. Is this data, in 131, from your summary 13 -- I'm sorry.
- 20 From your summary 129?
- 21 A. It is. I've compared it line by line, and the data on this
- 22 is reflected in my summary.
- MS. BOLSTAD: The Government moves to offer summary
- 24 Exhibit 131.
- 25 THE COURT: As a summary, yes.

Case 3:14-cr-00267-JO Document 228 Filed 03/24/16 Page 32 of 45 32 Andersen - D Counsel, any objection? 1 2 MR. SEPP: Sorry. No. 3 MR. ANDERSEN: No. 4 THE COURT: Than you. 5 BY MS. BOLSTAD: Detective Andersen, could you please go through the data on 6 7 summary Exhibit 131 with the jury and don't go too fast. 8 Α. Sure. 9 So what we have on the left is a list of dates and --10 I'm sorry. Just a list of times, followed by a summary of 11 who's calling whom, with some faces to the names, to the right. 12 And so, beginning, all of these calls are on April 13 2nd of 2014. The first is Shane Baker calling the Mexican 14 Bobby number he has saved in his phone, at our direction, to 15 order the 8 ounces that we later seized. And that call was 16 placed at 3:43 p.m. 17 Q. And so this -- for this entire summary exhibit, is every 18 orange coded entry a call from Mr. Baker's phone? 19 Yes. Α. 20 Or to --Q. 21 Α. Or to. 22 -- Mr. Baker's phone? Q.

- 23 A. Correct.
- Q. And were each of those orange entries actually observed by
- 25 you or Detective McNair on Baker's phone?

33

1 A. Yes.

- 2 Q. Okay. What else do you see?
- 3 A. So the next line listed is a call at 4:11 p.m., where that
- 4 | number, the 760 number, saved as Che in Placido Ramirez's
- 5 phone, called Placido Ramirez-Coronel.
- 6 That's followed by Placido Ramirez returning another
- 7 call to Che at 4:26 p.m. And at 4:48 p.m., Placido
- 8 Ramirez-Coronel called Fabian Sandoval-Ramos.
- 9 At 4:49 and 4:53 p.m., there were two calls between
- 10 Che and Placido Ramirez-Coronel.
- 11 And then at 4:58 p.m., Baker calls the Mexican Bobby
- 12 number, the 442 number, to say that he's arrived at the
- 13 \blacksquare 7-Eleven.
- 14 \blacksquare Q. After that call was placed by Mr. Baker at 4:58, is that
- 15 when Detective McNair notified surveillance teams to be on the
- 16 lookout? For move --
- 17 A. That's my understanding of that.
- 18 Q. On the lookout for movement?
- 19 A. Correct.
- 20 Q. Okay. So what happened in the phone records after
- 21 Mr. Baker arrived at the meeting location?
- 22 A. At 4:59 and 5:19 p.m., there were two calls between the Che
- 23 number, the 760 number, and the Placido Ramirez-Coronel number.
- 24 And at 5:19 p.m., the Mexican Bobby number called
- 25 | Shane Baker, and the person on the phone asked where Shane

1 Baker was. And Shane Baker told the person he had arrived.

A minute later, at 5:20 p.m., the Che number again called Placido Ramirez-Coronel. And one minute later, Shane Baker received a phone call from the number he had stored as Mexican Bobby, the 442 number, telling him to change locations; to go to the Lowe's instead of the 7-Eleven.

At 5:22 p.m., Placido Ramirez-Coronel calls the 760 number he has saved as Che. And one minute later, Shane Baker receives a phone call from the Mexican Bobby number, the 442 number, again, talking about the change in location.

Several minutes later, at 5:27 p.m., Placido

Ramirez-Coronel calls the Che number again. And then at some time around that 5:30 p.m. time frame is when the traffic stop occurs. And that's noted by the yellow line that says "traffic stop."

After that, at 5:30 and 5:32 p.m., there are two calls from Che, reaching out to Placido Ramirez-Coronel, followed by 5:39 p.m., Sandoval-Ramos calling Ramirez-Coronel. Followed by 5:39 p.m., Fabian Sandoval-Ramos then calls twice out to Che, the 760 number, which is saved in his phone under the name "G."

At 5:41 p.m. -- actually, I'm sorry. I take that back. The phone calls -- the two calls that were placed were not placed from the iPhone. They were placed from the 206 number that came from the dumpster.

35

At 5:41 p.m., two additional calls from the Che number to Placido Ramirez-Coronel. And then 5:41 and 5:42 p.m., two more calls from Fabian Sandoval-Ramos's phone, that was found in the dumpster, to the number saved as "Che" in Placido Ramirez's phone. That was also saved as "G" in the other Fabian Sandoval-Ramos phone.

- Q. And in your summary, 129, is the exact phone that made the call, is that included in that document?
- 9 A. Yes. The document includes the -- the time; as well as the length of the call in seconds; the originating phone number itself; the destination number; and then the name, if any,
 - Q. Below the yellow line on this page, the yellow line being the traffic stop, was there the ability of Mr. Arcila or Mr. Ramirez-Coronel -- were their phones able to be -- were they able to take calls or place calls after the traffic stop?
- 17 A. No, their phones were kept from them.

saved in the contact list, next to that.

- Q. Okay. Have you seen this kind of pattern before?
- 19 A. Yes.

1

2

3

4

5

6

12

13

14

15

- Q. And in your experience in the field, does this pattern represent a type of organization?
- 22 A. Yes.
- 23 Q. What type?
- 24 A. Dispatch-runner organization.
- 25 \parallel Q. The events on April 2nd, were those events highly

36

1 controlled and done at law enforcement direction?

A. Yes.

- 3 Q. Did you observe this pattern, looking at the call records
- 4 from earlier in the month of March?
- 5 A. Yes.
- 6 Q. Did you have great control or observation over the events
- 7 prior to March 29th?
- 8 A. No.
- 9 Q. Given what you observed in this controlled day and time,
- 10 were you able to find patterns similar, earlier in March?
- 11 A. Yes.
- 12 Q. Tell us about what you found, in terms of patterns.
- 13 A. So just as on April 2nd, when we did the controlled buy
- 14 | where we seized 8 ounces in Milwaukie on March 31st, this same
- 15 call pattern was present.
- 16 Shane Baker would reach out to call Mexican Bobby to
- 17 place his order, and then Placido Ramirez-Coronel's phone would
- 18 \parallel receive a phone call from the number he had saved as Che.
- 19 Q. Not from the Mexican Bobby phone?
- 20 A. Not from the Mexican Bobby phone.
- 21 Q. That was on the 31st?
- 22 A. Correct.
- 23 Q. Did you see the pattern on any other dates in March?
- 24 A. Yes.
- 25 Q. What date?

1 A. March 22nd, March 24th, March 27th, and March 29th. Just

2 focusing on that week prior to -- I'm sorry -- to the death of

3 Justin Delong.

MS. BOLSTAD: Nothing further are on direct, your

5 Honor.

4

6

7

8

9

10

11

15

THE COURT: Mr. Andersen.

MR. ANDERSEN: Thank you.

CROSS-EXAMINATION

BY MR. ANDERSEN:

Q. I'm going to look at just this demonstrative 129.

THE COURT: For the jury?

MR. ANDERSEN: I'm sorry. That is -- I believe that

13 has been admitted before the jury.

14 THE COURT: Yes. So if you're going to ask the

witness about it, display it to the jury, please.

16 Thank you.

Go ahead.

18 BY MR. ANDERSEN:

19 Q. And I'm on the second page there.

20 I'm just trying to make out -- now, this is a

21 summation that you said of -- of the toll records that you

22 | compiled. Correct?

23 A. Yes.

Q. Now, for example, I've looked at -- it's the second -- if

38

1 looking at the second part, 4-2-14 at 17:39.

A. Yes.

- 3 \parallel Q. And it says it's a 34-minute -- or a 34-second call.
- 4 Right? Would you agree with that?
- 5 A. Yes. There's two records that reflect that call. The one
- 6 that you referenced that says 34 seconds and the one that's
- 7 directly above it.
- 8 So in red, where it says, Call placed from 206 to the
- 9 360 and the word -- the word "Faby" is next to it, in quotes,
- 10 that's the phone as it was reflected on Placido's phone.
- 11 The call, as it's reflected on Fabian
- 12 Sandoval-Ramos's and on the tolls from the 260 number -- sorry,
- 13 the 206 number, show it as a 34-second call.
- So if you imagine, on Fabian Sandoval-Ramos's end, on
- 15 the 206 line, as you dial a number and it rings and it rings
- 16 and it rings and no one answers, there's a time elapse there.
- On the records from Placido's phone, it just shows as
- 18 ■ a missed call. So there was no time length captured because
- 19 | his phone doesn't reflect it as a call that any length of time
- 20 was captured on because he never answered it.
- 21 0. Okay. So it sounds to me like these numbers -- the
- 22 duration numbers don't necessarily coincide with any actual
- 23 call. You could -- in this situation, you have 34 seconds.
- 24 But it was never actually a call --
- 25 \blacksquare A. Yeah. If you're placing the call and there's time elapsed

39

while the phone is ringing or going to voice mail, there's an elapsed time recorded by the phone company, there, to bill you for those minutes.

If you're a person who has a device and the device just rings and rings and you never answer it, your phone just marks that as a zero-second call that you never answered. So that's what the difference is between those two.

- Q. Okay. So if you're calling me, my phone might say zero, if

 I just let it ring forever, and your phone might say --
- 10 A. The elapsed time it was ringing.
- MR. ANDERSEN: Sorry. Did you get my question?

 THE COURT REPORTER: Yes.
- 13 BY MR. ANDERSEN:

1

2

3

4

5

6

7

8

9

15

- 14 Q. And I think your answer was yes?
 - A. It was the elapsed time it was ringing, yes.
- 16 Q. Maybe for clarity's sake, I should re-ask that.
- Just to clarify, if -- for example -- you wanted to

 call me and -- and I just let it ring -- I'm sure I wouldn't do

 that if I knew you were calling. But my phone might say zero,

 and your phone might say 200 seconds, or however long?
- A. Probably not 200, unless I was leaving a really long voice mail, begging you to call me back.
- Q. Or just -- or if I didn't have an answering machine, or for whatever reason --
 - A. Exactly.

Andersen - X

Q. So -- I mean, it sounds to me like the numbers don't necessarily coincide with any particular length of time of a call necessarily. Right?

A. If they're provided from the phone company, they typically would because they're produced in a way that allows the phone company to bill for minutes of air time that are used.

So if there are records that were drawn from a phone download, that would be a different case. But the records that are toll specific would have a more accurate reflection of number of seconds elapsed.

- 11 Q. Well, but it did, when we already figured out that this 34 is not accurate. Right?
 - A. Well, we would assume -- or we would infer that that's 34 seconds where the phone calling from the dumpster is ringing and ringing and ringing for 34 seconds, as the phone is never answered on the other end.
 - Q. Right. So in terms of actual talk time, that 34 doesn't have anything necessarily to do with any sort of talk time, is what I'm asking.
- 20 A. I don't know whether the phone company bills on talk time 21 or just open line time.
- Q. Well, I'm not talking about billing. I'm just saying, if
 we look at this same one we've been looking at, 34 seconds
 doesn't mean that anybody talked to anybody else for 34 seconds
 while on the phone line?

A. Correct. It means that that line was open for 34 seconds, according to Verizon.

Q. Right. So my question -- I -- I think you've answered this a couple of times, but I'm not clear on the answer.

5 That 34 seconds is not tied to a specific talk time of anybody talking. Right?

- 7 A. It's tied to an open line time, if -- you could put it that way.
- 9 Q. Okay. Would you answer my question yes or no?
- 10 A. Rephrase your question. I'm sorry.
- 11 \mathbb{Q} . Well, my question is does the -- the 34 seconds is not tied
- 12 to a talk time. Right?
- 13 A. In this particular instance, no.
- 14 Q. Okay. So we can assume that all of the other numbers
- aren't necessarily tied to a talk time. They might be tied to
- an open line time, which might also indicate that there was
- 17 talking going on, but not necessarily. Right?
- 18 A. Well, I think it would depend on the context. Like if we
- 19 have calls where Mr. Baker is on the phone and we know we
- 20 observe those, we know that those are meaningful talk time
- 21 conversations.
- Q. Well, not necessarily a message situation either, right?
- 23 If we know Mr. Baker is calling somebody and you know
- 24 he's talking, you're not sitting there with stopwatch, timing
- 25 how long he's talking necessarily, are you?

A. Well, if we could play a recording of a call that was made,
we could compare it to the length of time the call was open on
the phone tolls, and that would give us an idea of how much

Q. Okay. All right. All right.

time has elapsed.

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

24

25

Let's see. I think that's all of the questions I have on that particular subject.

Now, I mean, this is clear, but you can't necessarily tell who's talking on the phones just by looking at the phone, right --

THE COURT REPORTER: I need you to slow down, please.

THE COURT: You really must slow down.

And it is the end of the day, and we do want to wrap up the witness. But this is obviously very important material for you to clarify, so take it slower.

MR. ANDERSEN: Thank you.

BY MR. ANDERSEN:

Q. This should be a simple question.

You can't necessarily tell, just by looking at the phone records, if any particular person was the particular person actually using the phone. Right?

- A. Exactly. By the phone records alone, you couldn't be sure.
- 23 Q. If I may, I'm going to switch gears.

And I'm going to show you an exhibit that I believe is going to be Defense 207. I think that's where we're up to.

43 Andersen - X (Pause, conferring.) 1 THE COURT: Is that the next in order, Mr. Sepp? 2 3 MR. SEPP: I think it's '08. MR. ANDERSEN: '08? 4 MR. SEPP: Yeah, should be 2008 (phonetic). 5 THE COURT: 208. 6 7 MR. SEPP: 208. 8 MR. ANDERSEN: Thank you. 9 MS. COOKE: It is. 10 MR. ANDERSEN: Thank you. 11 BY MR. ANDERSEN: 12 Well, first of all, are you familiar with just general jail 13 booking records, and things of that nature? 14 A. Generally. 15 Could you look at that, and can you identify that? That 16 first page of that exhibit? 17 A. Yeah. It looks to be a summary of the Clackamas County 18 receipt for a defendant which, in this case, is listed as 19 Placido Ramirez-Coronel. And it has a date and time of May 20 27th, 2014, at 4:56 p.m. 21 And it lists a citizen adjacent to Placido's name of 22 Magdalena Ramirez-Coronel, with an address in Ukiah, and an 23 amount posted of bail of 15,000 dollars, with some additional 24 notes of a date to appear in court.

Okay. And were you actually -- were you involved in

```
44
                              Andersen - X
    this -- in this transaction at all? Are you familiar with this
 1
 2
     actual transaction? The paying of bail?
 3
    A. Yes.
 4
               MR. ANDERSEN: Your Honor, I would like to admit
 5
    Defense 208.
 6
               THE COURT: Any objection?
 7
               MS. BOLSTAD: No objection.
 8
               MR. SEPP: No objection.
 9
               THE COURT: 208 is received, may be published.
10
               Please proceed.
11
               MR. ANDERSEN: I don't have any particular questions
12
     or any particular other questions about this piece of evidence.
    But --
13
14
               THE COURT: All right. Go on with your -- conclude
15
    your cross, please.
16
               MR. ANDERSEN: That is all of the cross that I have.
17
     Thank you.
18
               THE COURT: Thank you.
19
               Mr. Sepp.
20
               MR. SEPP: I have nothing for this witness, your
21
    Honor.
22
               THE COURT: Redirect, Ms. Bolstad.
23
               MS. BOLSTAD: Nothing, your Honor. Thank you.
24
               THE COURT: Subject to confirming the receipt of your
25
     exhibits, does the Government rest?
```

Case 3:14-cr-00267-JO Document 228 Filed 03/24/16 Page 45 of 45

Andersen - X MS. BOLSTAD: The Government does rest. (Conclusion of excerpt.) --000--I certify, by signing below, that the foregoing is a correct stenographic transcript of the oral proceedings had in the above-entitled matter this 21st day of March, 2016. A transcript without an original signature or conformed signature is not certified. I further certify that the transcript fees and format comply with those prescribed by the Court and the Judicial Conference of the United States. /S/ Amanda M. LeGore AMANDA M. LeGORE, CSR, RDR, CRR, FCRR, CE CSR No. 15-0433 EXP: 3-31-2018